

Summary of Superfund Cleanup and RCRA Closures at the FMC Plant Area of the Eastern Michaud Flats Site

(An abbreviated version was presented by Rob J. Hartman, FMC Remediation Project Director, to the Environmental Committee of the Idaho Optimum Initiative on February 25, 2003)

1991 : FMC and Simplot enter into an Administrative Order on Consent (AOC) with EPA for Remedial Investigation and Feasibility Study (RI/FS) of the Eastern Michaud Flats (EMF) Site. Superfund RI/FS begins.

1992-1994 : FMC and Simplot conduct extensive RI sampling and analyses at each plant and the off-plant areas at the EMF Site.

1993-1994 : FMC performs initial phase of closure of RCRA Pond 8S as an "emergency removal action" under Superfund. Last unlined pond at FMC plant closed.

1995 : EPA issues Human Health Risk Assessment and Ecological Risk Assessment for the EMF Site. FMC and Simplot prepare Draft Remedial Investigation Report.

1996 : Final Remedial Investigation Report for the EMF Site. Report details results of investigations of input, byproduct and waste materials; surface and subsurface soils at the plants; groundwater; surface water and sediment; air emissions; off-plant surface soil; and ecological investigations conducted during the RI. Report is 13 volumes, approximately 36 lineal inches of binders with results of RI.

1997 : Final Feasibility Study Report. FS Report details areas identified for remediation, evaluation of numerous technical options for performing remediation, and comparative analysis of remedial alternatives.

1997 : EPA issues Proposed Plan that identifies EPA proposed remedy for the EMF site. Proposed remedies are separately identified for the FMC plant, Simplot plant and the Off-plant area. EPA conducts public meetings and public comment period.

1998 : EPA issues Record of Decision (ROD) for the EMF Site for EPA-selected remedies for the FMC plant, Simplot plant and the Off-plant area. The ROD includes a "responsiveness summary" to comments received during comment period on the Proposed Plan.

1998 : FMC and Simplot sign separate Consent Decrees for Remedial Design and Remedial Action (RD/RA) to implement EPA selected remedies at the respective plants. Each Decree includes requirement for FMC and Simplot to conduct EPA-selected remedy for the Off-plant area.

1999 : Department of Justice (DOJ) requests modification of the previously signed Consent Decrees, after agreeing to modifications; FMC and Simplot again sign separate Consent Decrees for Remedial Design and Remedial Action (RD/RA) to implement EPA selected

remedies. Both Decrees lodged with the Federal District Court for the State of Idaho.

1999 : FMC completes final closure of RCRA Pond 8S and initial phase of closure of RCRA Ponds 8E, Phase IV ponds and Pond 15S.

2000 : FMC files a motion for entry of its Decree with the District Court, seeking to implement the remedy. DOJ files motion to withdraw Decree with the District Court citing need for EPA to further review the selected remedy. District Court denies FMC's motion for entry.

2000 : FMC completes final closure of RCRA Pond 9E and initial phase of closure of RCRA Pond 16S.

2001 : FMC plant ceases operation. FMC begins decommissioning plant.

2002 : Simplot Decree for RD/RA at Simplot plant entered by District Court. Revised Decree does not include Off-plant area. EPA/DOJ intend to prepare separate Decree for Off-plant area.

2002 : FMC completes initial phase of closure of RCRA Ponds 17 and 18 cell A. Only Pond 18 cell B (triple-lined) and the calciner ponds (all double-lined) remain with open water.

2002 : FMC signs Consent Order with Idaho Department of Environmental Quality (IDEQ) for remedial action at the calciner ponds that are located on the portion of the plant site that is not within the Ft. Hall Reservation boundary.

2003 (PLAN) : EPA and FMC discussing Supplemental RI/FS to include former operations areas not specifically addressed in the 1996 RI Report. Complete final closure of Ponds 8E, Phase IV ponds and Pond 15S. Begin remedial action to "close" calciner ponds under the Consent Order with IDEQ. Continue facility decommissioning.